



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMH  
F. #2013R00948

*610 Federal Plaza  
Central Islip, New York 11722*

November 3, 2017

By Hand and ECF

The Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Philip A. Kenner and Tommy C. Constantine  
Criminal Docket No. 13-607 (JFB)

Dear Judge Bianco:

The government respectfully writes to request that the Court set a forfeiture briefing schedule as to both defendants in the above-referenced matter, as discussed at the status conference held before Your Honor on October 25, 2017. See ECF No. 505. The government proposes the following schedule as to forfeiture:

- February 28, 2018 – Defendants to file briefs in opposition to government's forfeiture motion (see ECF No. 401)
- March 30, 2018 – Government to file reply (if any)
- Date convenient for the Court on or after April 9, 2018 – Oral Argument

The government has consulted with counsel for both defendants, who consent to the proposed schedule as to forfeiture.

Respectfully submitted,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ J. Matthew Haggans  
J. Matthew Haggans  
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cc: Clerk of Court (JFB) (By ECF)  
Counsel of Record (By ECF)